

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

GEORGE COLLINS and
ALRIKA COLLINS,

Plaintiffs,

V.

STATE FARM FIRE AND
CASUALTY COMPANY,

Defendant.

§ § § § § § § § § §

CASE NO. 22-cv-00318-RAW-JAR

PLAINTIFFS' FINAL EXHIBIT LIST

COMES NOW Plaintiffs, George Collins & Alrika Collins (“Plaintiffs”), and files Plaintiffs’ Final Witness and Exhibit List and would respectfully show the Court the following exhibits:

Ex. No.	EXHIBIT
1.	Collins' Proof of Loss, dated July 16, 2021 (COLLINS_000055-000057)
2.	Collins' Final Request for Full Payment of Damages, dated January 10, 2022 (COLLINS_000052-000054)
3.	Fire Department Report, dated January 11, 2021 (COLLINS_000849)
4.	Letter assigning Claim to Special Investigative Unit, dated January 29, 2021 (COLLINS_000872)
5.	Decision Letter, dated February 17, 2021 (COLLINS_000883-000885)
6.	Decision Letter for Contents, dated March 23, 2021 (COLLINS_000995-001003)

7.	March 29, 2021 Letter Ian Rupert to State Farm representation letter/request for information re claim (COLLINS_001124-001125, 001131)
8.	Photographs of Property Damage.
9.	SF Payment Worksheet dated April 9, 2021 (COLLINS_001136-1150)
10.	State Farm letter dated April 8, 2021 (COLLINS_001150-1155)
11.	3D Matterport of Damage to Property (accessible via link at COLLINS_000055)
12.	Chad T. Williams' inspection photographs, dated May 4, 2021 (COLLINS_000151-000169)
13.	Luke Hibbs' inspection photographs, dated June 11, 2021 (COLLINS_000333-000385)
14.	State Farm Correspondence with Rupert dated June 17, 2021 (COLLINS_001164-001167)
15.	Rupert Letter to SF request for claim information dated June 19, 2021 (COLLINS_001171-001173)
16.	State Farm correspondence claim estimate dated June 28, 2021 (COLLINS_001179-001282)
17.	Rupert-Collins Letter to SF about settlement duties dated September 26, 2021 (COLLINS_001370-001388)
18.	State Farm email correspondence of October 1, 2021 (response to September 27 letter) (COLLINS_001424)
19.	State Farm Estimated RC Benefits Remaining (COLLINS_001444-1457)
20.	Personal Property Payment Worksheet October 11, 2021 (COLLINS_001458-1482)
21.	State Farm Estimate dated October 11, 2021 (COLLINS_001483-1579)
22.	Rupert Letter to State Farm Supplementing Request for information dated October 11, 2021 (COLLINS_001580-1583)
23.	Estimate provided by Derek VanDorn (hired by SF) (dated August 2021) (COLLINS_001588-1641)

24.	State Farm email dated October 19, 2021 (request for information) (COLLINS_001642-1647)
25.	CK Restoration, LLC Estimate dated September 14, 2021 (COLLINS_001648-1653)
26.	State Farm email dated October 21, 2021 (COLLINS_001654-1679)
27.	Email Correspondence with State Farm October 27 and 28, 2021 (COLLINS_001680-1683)
28.	State Farm Payment Worksheet (personal property) dated November 29, 2021 (COLLINS_001704-1728)
29.	Email Correspondence Rupert-Serve Pro (copied to SF) November 30, 2021 (COLLINS_001729-1735)
30.	Rupert correspondence with SF December 22 and 23, 2021 (COLLINS_001740-1741)
31.	State Farm email (response to final warning letter) dated January 14, 2022 (COLLINS_001745)
32.	Ian Enterprise's inspection photographs of Property and Contents, dated April 23, 2021 (COLLINS_000483-000843)
33.	Wagoner County Assessor's Historical Photographs of Property in 2015 and 2017 (COLLINS_000139-000141)
34.	Ian's Enterprise, LLC Estimate, dated July 16, 2021 (COLLINS_000387-000482)
35.	Email regarding travel trailer for temporary housing, dated July 10, 2021 (COLLINS_000001028)
36.	Repurchase Invoices and Receipts (COLLINS_001020-001021, 001029-001039)
37.	Contents Cleaning Invoices and Receipts dated January 20, 2021 (COLLINS_001010-001015)
38.	Damaged Contents List, dated January 20, 2021 (COLLINS_000981-000982)

39.	Damaged Contents List, dated January 26, 2021 (COLLINS_000983)
40.	Damaged Contents List, dated January 29, 2021 (COLLINS_000984)
41.	Damaged Contents List, dated February 15, 2021 (COLLINS_000985)
42.	Damaged Contents List, dated February 18, 2021 (COLLINS_000986)
43.	Rental Agreement (COLLINS_001042)
44.	All Rent Receipts (COLLINS_001040, 001043)
45.	Certified Policy, Policy No. 36-B3-L971-9, effective from May 9, 2020 through May 9, 2021. (COLLINS_000001-000051)
46.	Redacted Claim File for Claim No. 36-15K5-35N (COLLINS CL 36-15K5-35N 0001-166)
47.	SF Fire Request Review (COLLINS CL 36-15K5-35N 0167-0231)
48.	SF Fire Claim File Print (Financial Information) (COLLINS CL 36-15K5-35N 0232-0234)
49.	SF Bookmarks for Claim (COLLINS CL 36-15K5-35N 0235)
50.	SF Document List Report for Claim (COLLINS CL 36-15K5-35N 0236-0475)
51.	State Farm Ownership Audit (COLLINS CL 36-15K5-35N 5517-5518)
52.	State Farm Estimate Audit Trail (COLLINS CL 36-15K5-35N 5519-5528)
53.	SF Internal Claim Communications and Documentation (COLLINS CL 36-15K5-35N 0476-8116) (Voluminous exhibit including emails with attachments, emails to the claim file- - Plaintiffs expect to pare this exhibit (or break up into multiple exhibits) once depositions are completed.

54.	Relevant portions of the State Farm Fire and Casualty Company's Underwriting File for the Property.
55.	Chad T. Williams' Engineer Report, dated Mary 11, 2021 (COLLINS_000127-000135)
56.	Chad T. Williams' CV (COLLINS_000260-000262)
57.	Kevin Dandridge's Safety Report, from June 2021 (COLLINS_000273- 000314)
58.	Kevin Dandridge's CV (COLLINS_000328-000330)
59.	Luke Hibbs' Inspection Report, dated June 11, 2021 (COLLINS_000331-000332)
60.	3D Matterport Diagram of Property (COLLINS_000844-000846)
61.	Any exhibits listed by Defendant and not objected to by Plaintiffs.
62.	Plaintiffs retain the right to supplement this list as discovery is ongoing.

Plaintiffs expect to amend or modify this list because (1) depositions have yet to be completed; (2) some documents overlap or are duplicated in multiple exhibits; and (3) Exhibit 53 is a voluminous exhibit containing State Farm's internal documents related to the claim. Some of the documents are included in Plaintiffs' production and listed as separate exhibits above. Once discovery has concluded, Plaintiffs will modify this list to eliminate duplication (or unnecessary items) and to break up Exhibit 53 into multiple exhibits (after culling the unnecessary).

Respectfully submitted,

/s/Terry M. McKeever

Terry M. McKeever
OBA No. 21751

tmm@fylaw.com
S. Alex Yafe
OBA No. 21063
ay@fylaw.com

FOSHEE & YAFFE
P.O. Box 890420
Oklahoma City, Oklahoma 73189
Telephone: (405) 378-3033

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE/EXCHANGE

I hereby certify that a true and correct copy of the foregoing instrument was served on all parties through counsel of record pursuant to the Federal Rules of Civil Procedure on September 29, 2023, in the manner described below:

Via ECF filing to:

J. Andrew Brown
State Bar No. 22504
dbrown@abg-oklawfirm.com
John S. Gladd
State Bar No. 12307
jgladd@abg-oklaw.com

**ATKANSON, HASKINS, NELLIES,
BRITTINGHAM, GLADD & FIASCO**
1500 ParkCentre Bldg.
525 S. Main Street
Tulsa, Oklahoma 74103
Telephone: (918) 582-887
Facsimile: (918) 582-8096

ATTORNEYS FOR DEFENDANT

/s/Terry M. McKeever

Terry M. McKeever